



RE: EPH/VPH, EPA direction

Ryan Barth to: Sean Sheldrake

10/12/2011 09:55 AM

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Tom, Carl Stivers, Patty Dost, Robert Wyatt, John Edwards, Evie
Caldwell, Kim Slinski , John Verduin, Tom Schadt

1 attachment



Gasco AIR EPH Direction Corr to EPA_101211.pdf

As verbally agreed to during the September 20, 2011 technical meeting between NW Natural, Siltronic Corporation, and EPA, attached please find NW Natural's formal agreement to complete the below directed EPH analyses. Please let me know if you have any questions.

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-----Original Message-----

From: Sheldrake.Sean@epamail.epa.gov [mailto:Sheldrake.Sean@epamail.epa.gov]
Sent: Thursday, September 15, 2011 9:57 AM
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GAINER Tom
Subject: Re: EPH/VPH, EPA direction

Bob,

EPA directs NW Natural and Siltronic to analyze soil and sediment samples collected during the data gaps investigation fieldwork and archived for potential EPH analysis. These samples have already been analyzed for VPH. EPA understands this consists of the following samples:

- Riverbank soil (collected at 12 borings Sept 27-Oct 15, 2010) which includes all samples selected for the full chemistry suite (24 samples)
- Sediment grabs collected at 13 stations Oct 12-14, 2010
- Sediment grabs collected at 8 stations April 18-19, 2011

EPA is providing this direction now to ensure consistency with the Harborwide process; specifically, the Portland Harbor Baseline Ecological Risk Assessment (BERA) has not been finalized and there are still concerns about the sediment Preliminary Remediation Goals (PRGs) with respect to TPH and benthic risk. In addition, the current sample set will begin expiring for its holding times later this month for EPH analysis. This decision is also necessary to be consistent with adjacent upland work; Oregon Department of Environmental Quality guidance supports the need to perform this analysis from the standpoint of source contro for riverbank soils and sediments.

Thank you.

S

Sean Sheldrake, RPM, Unit Diving Officer USEPA, Region 10 Environmental
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Region 10 Dive Team: <http://yosemite.epa.gov/r10/oea.nsf/webpage/dive+team>
Portland Harbor Cleanup:
<http://yosemite.epa.gov/r10/cleanup.nsf/sites/ptldharbor>
Green Cleanups:
<http://yosemite.epa.gov/R10/extaff.nsf/programs/greencleanups>
Green Cleanups (EPA only):
<http://204.47.216.153:9876/r10/infopage/cleanup.nsf/webpage/greener>

+cleanups

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|EPA/VPH

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Hi Sean,

Upon receipt of your approval letter NW Natural immediately directed the laboratory to conduct the VPH analysis and to continue archiving the EPH samples collected from the 13 surface sampling stations identified in our October 14 proposal. Although we directed the lab to conduct the VPH analysis immediately following receipt of your letter, the lab has informed us that the VPH sample analysis may not be completed within the standard 14-day hold time. In addition to the VPH analysis, NW Natural has located the limited Lower Willamette Group TPH fraction data set that EPA requested. The attached file includes a sample location map, geologic logs, and the available TPH fraction data for those samples.

Review of this data supports the conclusion that analysis of additional samples for EPH and/or VPH is unwarranted. In addition to the reasons previously provided, this review confirms that there was no VPH data collected for the Portland Harbor Site, and that there is no EPH toxicity identified at the Gasco site based on comparison to the EPA-provided TPH TRVs.

NW Natural still believes that evaluation of TPH fractionation data is, and will continue to be, inconsistent with the Portland Harbor Site process. We also believe that TPH fraction data is not needed as a potential line of evidence to adequately define risk and set action levels for development, evaluation and design of the EE/CA remedy. If these data become consistent with the Portland Harbor Site process in the future, NW Natural would agree at that time to perform the necessary evaluation of the data and/or implement future data collection/analysis to support the EE/CA remedy development and design. Currently, we have no basis or means to evaluate the existing data in a manner consistent with the Portland Harbor Site process that would provide meaningful results that support the Gasco project.

Please let me know if you have any questions.

Thank you,

Bob(See attached file: Gasco LWG TPH Fraction Sampling
Loc_Data_Logs_102810.pdf)